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**December 3, 2020**

**Via ECF**

Hon. Vernon S. Broderick, USDJ  
United States District Court, SDNY  
40 Foley Square  
New York, NY 10007

**APPLICATION GRANTED**  
**SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J. 12/4/2020**

Plaintiff's deadline to file his response to Defendants' motion is hereby extended to December 7, 2020. Defendants shall file any reply by on or before December 14, 2020.

**Re: Rubio v. BSDB Management Inc. et al**  
**Case No. 19-CV-11880 (VSB)(SN)**  
**Motion for Extension of Time**

Dear Judge Broderick:

My firm represents plaintiffs in the above-referenced actions, and I respectfully write to request a brief extension to December 7, 2020 of the December 3, 2020 deadline for Plaintiff to respond to Defendants' motion to amend – the Court can also extend Defendants' December 8, 2020 deadline to respond accordingly. We were expecting to file our response by the deadline, but some additional time is needed to finalize and file the papers. As such, as were not able to reach out to Defendants prior to making this request but note that the requested extension is only two business days and the Court had originally given Plaintiff three weeks until December 31, 2020 for Plaintiff's reply to the original motion. No prior request for an extension of this deadline was made.

We thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan

By: Abdul K. Hassan, Esq.

**cc: Defense Counsel via ECF**